



U.S. Department of Justice

United States Attorney  
Southern District of New York

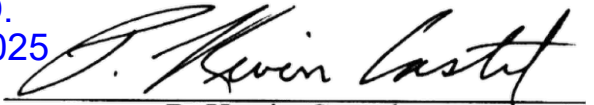
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 24, 2025

**BY ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application Granted.  
SO ORDERED.  
Dated: 6/24/2025

  
P. Kevin Castel  
United States District Judge

**Re: *United States v. Asa Saint Clair*, S1 19 Cr. 790 (PKC)**

Dear Judge Castel:

The Government respectfully writes to request a two-week extension of time, from June 30, 2025, to July 14, 2025, to respond to defendant Asa Saint Clair's motion brought pursuant to 28 U.S.C. § 2255. The adjournment is necessary because the Government only recently received an affidavit from defendant's trial counsel and is still in the process of obtaining supporting materials from former trial counsel.

As the Court is aware, the defendant filed a Section 2255 motion to vacate his conviction, based primarily on claims of ineffective assistance of counsel, on February 3, 2025. (Dkt. 135). This Court ordered the Government to respond to that motion by April 12, 2025. (Dkt. 137). On February 11, 2025, having determined that it was necessary to obtain a statement from prior counsel to respond to the allegations of ineffective assistance, the Government requested that the Court enter an order requiring the defendant to sign an attorney-client privilege waiver to proceed with his motion. (Dkt. 138). That Order was entered the same day, and the defendant returned the signed attorney-client privilege waiver on April 29, 2025. (Dkt. 140). The Government understands that its response to the defendant's Section 2255 motion is, accordingly, due on June 30, 2025. (See Dkt. 138 (requesting 60 days from the receipt of the executed attorney-client privilege waiver to obtain an affidavit from prior counsel and file an opposition). The Government received an affidavit from prior counsel on June 11, 2025, but has not yet obtained all of the relevant exhibits. The Government accordingly respectfully requests a two-week extension, until July 14, 2025 – approximately one month from its receipt of the affidavit from prior counsel – to obtain those materials and finalize its opposition.

The Government does not believe that the requested adjournment will cause any material prejudice to the defendant, who was released from custody on December 6, 2024, and is currently serving his three-year term of supervised release.

Respectfully submitted,

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

By: /s/  
Emily Deininger  
Tara M. La Morte  
Assistant United States Attorneys  
(212) 637-2472 / 1041

cc: Asa Saint Clair, *pro se* (via mail)  
817 14<sup>th</sup> St. Way SW  
Edmonds, WA 98020